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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

20 TIFFANY RUFFA, KATHRYN CANFIELD,
21 and ISIDORE NIYONGABO, on behalf of
themselves and all others similarly situated.

22 Plaintiffs,

23 | v.

24 SOCIETY FOR HUMAN RESOURCE MANAGEMENT.

Defendant.

Case No. 4:21-cv-05549-DMR

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
AND COMPLETE MEDIATION
PROCESS PURSUANT TO GENERAL
ORDER 56**

Complaint Filed: July 20, 2021

Current Response Date: March 15, 2022

New Response Date: May 5, 2022

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1 Plaintiffs Tiffany Ruffa, Kathryn Canfield, and Isidore Niyongabo (“Plaintiffs”) and
 2 Defendant Society for Human Resource Management (“Defendant”), by and through their
 3 respective counsel, jointly stipulate to extend the time for (1) the completion of the mediation
 4 process pursuant to General Order 56 until April 29, 2022 and (2) Defendant to respond to the
 5 Complaint from March 15, 2022 to May 6, 2022.

6 This stipulation is made in good faith and not for the purpose of causing unwarranted
 7 delay. Good cause supports the extension because (i) only three prior extensions have been
 8 obtained, pursuant to ongoing settlement discussions, (ii) the Parties engaged in a Settlement
 9 Conference on March 1, 2022, by the court’s deadline, with court-assigned mediator Jamie L.
 10 Dupree, and the parties are continuing to engage in good faith settlement negotiations, and are in
 11 the process of scheduling a second mediation with Ms. Dupree, and (iii) the Parties are
 12 complying with this Court’s General Order 56 and the Court’s scheduling order in this case (Dkt.
 13 No. 5). Further, pursuant to Local Rule 6-1(a), this extension will not alter the date of any event
 14 or any deadline already fixed by Court order.

15 IT IS SO STIPULATED.

16 DATED: March 1, 2022

HOLLAND AND KNIGHT LLP

17 By: /s/ John H. Haney
 18 Thomas E. Hill
 19 Kristina S. Azlin
 20 John H. Haney

21 *Attorneys for Defendant*

22 DATED: March 1, 2022

DISABILITY RIGHTS ADVOCATES

23 By: /s/ Emily Seelenfreund
 24 Emily Seelenfreund
 25 Meredith J. Weaver
 26 Rebecca Williford

27 *Attorneys for Plaintiffs*

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1 **ATTESTATION OF CONSENT**

2 I hereby attest that all other signatories listed, and on whose behalf the filing is submitted,
3 concur in the filing's content and have authorized the electronic filing of this document with
4 their signature.

5 DATED: March 1, 2022

By: /s/ John H. Haney

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